



Stemming the Growing Tide of Rogue Online Pharmacies

The Internet is an increasingly important channel for the efficient and effective distribution of prescription drugs. Legitimate online pharmacies, such as drugstore.com™, are serving the growing numbers of online consumers by providing a safe, reliable, and cost-effective online drugstore. drugstore.com™ enables individuals to learn about their prescriptions, compare prices, learn about their potential drug interactions, research frequently asked questions of its clinical pharmacist staff and purchase their prescriptions -- all with a simple “point and click” on their computer.

Unfortunately, an alarming number of bad actors are posing as legitimate online pharmacies, confusing U.S. consumers and providing them with unsafe and illegal prescription drugs, including addictive narcotic drugs. These ‘rogue’ online pharmacies are bypassing the doctor/patient relationship in order to provide medications without an actual prescription. These illegal (often offshore) pharmacies are a serious threat to health and public safety and may provide consumers with pharmaceuticals that could be expired, diluted, contaminated, or even replaced with counterfeit medications.

drugstore.com™ ensures it meets the highest online pharmacy certification standards as one of the first online pharmacies to be awarded VIPPS® certification from the National Association of Boards of Pharmacy® (NABP®). Pharmacies displaying the VIPPS® seal on their website are in compliance with licensing and inspection requirements of their state and each state to which they dispense pharmaceuticals, as well as with stringent pharmacy practice criteria established by NABP®.

drugstore.com™ is reaching out to policymakers to be part of the solution in stemming the growing tide of illegal drugs imported into the United States by rogue online pharmacies. We are advocating a three-stemmed approach to stopping these bad actors in their tracks and in making the Internet safe for prescription shoppers.

?? Create a uniform certification standard

- Adopt VIPPS® or other standard to ensure certain regulations are met such as:
 - ~~///~~ No re-importation of prescription drugs
 - ~~///~~ Must meet doctor/patient relationship as endorsed by AMA
 - ~~///~~ Must meet all state/federal regulations for operating as online pharmacy
 - ~~///~~ Certification must be prominently displayed for consumers

- ?? Make it illegal for online pharmacies to advertise on search engines unless they meet approved standard
 - Prohibit search engines from accepting advertisements from online pharmacies unless they were properly certified
 - Make it illegal to advertise that you do not need doctor's prescription to get medication since that would not meet certification
- ?? Stop credit card payment to pharmacies who do not meet certification standard above (i.e. illegal pharmacies)
 - Similar to effort by Congress to starve funding of illegal Internet gambling sites, stopping credit card payment to illegal pharmacies would stop these rogue sites at the source.
 - As with Internet gambling, by definition, the activities of these rogue pharmacies are illegal under U.S. law and should be stopped. Stemming the flow of funds to these sites will largely help to accomplish that goal.
- ?? Motivate third party shippers to not accept illegal shipments from pharmacies who do not meet the certification standard above
 - One of the benefits of a clear certification standard – is that the e-commerce enablers (media, payment, delivery) all can identify legitimate pharmacies vs. illegal operators

As rogue Internet pharmacies are investigated by the U.S. Congress, drugstore.com stands ready to act as a resource in finding the best solution to this compounding issue. U.S. consumers should feel confident that the online marketplace is as safe and secure as possible, especially with purchases as important to public health as prescription drugs. We are confident that the three-tiered approach outlined above are the areas necessary to deal most effectively with this growing public health problem.